

Big River Mine
Mod 981126 899
17.8
Pine Ford Proj.
9-16-76

September 16, 1976

Colonel Thorwald R. Peterson
District Engineer
Corps of Engineers
St. Louis District
270 North 12th Street
St. Louis, Missouri 63101



Dear Colonel Peterson:

The need for reservoir storage for water quality control in the Pine Ford Lake project in the Meramec River Basin has been reviewed by this office in reference to Section 102(b) of the Federal Water Pollution Control Act Amendments of 1972, as requested by your letter of July 16, 1976.

As indicated previously in the December 1964 U. S. Public Health Service Study, storage allocation in the Pine Ford Lake project for flow augmentation for water quality control cannot be supported. Our policy stipulates stream flow shall not be used as a substitute for the provision of adequate waste treatment or other methods of controlling waste at the source. EPA defines "adequate waste treatment or other methods of controlling waste at the source" as the best available pollution control technology economically achievable including advanced waste treatment techniques, land disposal, land management practices, process and procedure innovations, changes in operating methods and other alternatives.

Big River downstream from the proposed reservoir is an "effluent limited segment" as designated by the Missouri Clean Water Commission. An effluent limited segment is defined as a segment where water quality is meeting and will continue to meet applicable water quality standards, or where there is adequate demonstration that water quality will meet applicable water quality standards after the application of the effluent limitations required by Sections 301(b)(1)(A) and 301(b)(1)(B) of the Act. Therefore, waste discharges to Big River below the Pine

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Ford Lake project should be sufficiently treated at the source (when meeting minimum treatment requirements) to maintain water quality as indicated in the "Missouri Water Quality Standards," June 1973.

The Meramec River from U.S. 66 bridge at Times Beach to the confluence with the Mississippi River is a "water quality limited segment" as designated by MCHC. A "water quality limited segment" is defined as a segment where it is known that water quality does not meet applicable water quality standards and/or is not expected to meet applicable water quality standards even after the application of the effluent limitations required by sections 301(b)(1)(A) and 301(b)(1)(B) of the Act. In order to determine the problems caused by point sources, a waste load allocation study was completed in October 1974. From the various treatment systems evaluated, the recommended most cost effective approach was a regional system with discharge to the Mississippi River. The State's "Water Quality Management Basin Plan for the Upper Mississippi-Meramec River Basin" dated June 1976, proposes the strategy that the protected stream status be granted to the entire Meramec River below Kiefer Creek, whereby, discharges other than uncontaminated cooling water will be eliminated by the regional system. Accordingly, flow regulation for water quality in the lower Meramec is unwarranted.

Your letter requested that EPA provide revised data regarding water supply demand projections in the Meramec Basin. In accordance with Section 102(b)(2) of the Act, the construction agencies are granted the authority to determine the need and value of storage for stream flow regulation purposes other than water quality control. Thus EPA does not have the authority to develop or revise water supply demand projections.

Thank you for the opportunity to review this project at this stage of your investigation.

Sincerely yours,

Jerome H. Svore
Regional Administrator